

EXHIBIT A

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF MISSOURI
3 WESTERN DIVISION
4 TERRI YOLANDA LABLANCE,)
5)
6 Plaintiffs,)
7 vs.)
8)
9 MISSOURI DEPARTMENT OF) Case No. 4:19-cv-00693-BP
10 CORRECTIONS AND CORIZON)
11 HEALTH,)
12)
13 Defendants.)
14

15 *****
16 VIDEOCONFERENCE DEPOSITION OF STERLING REAM
17 TAKEN ON BEHALF OF THE PLAINTIFF
18 NOVEMBER 4, 2020
19 *****
20
21
22
23
24
25

STERLING REAM 11/4/2020

<p style="text-align: right;">Page 1</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE WESTERN DISTRICT OF MISSOURI 3 WESTERN DIVISION 4 TERRI YOLANDA LABLANCE,) 5) 6 Plaintiffs,) 7 vs.) 8) 9 MISSOURI DEPARTMENT OF) Case No. 4:19-cv-00693-BP 10 CORRECTIONS AND CORIZON) 11 HEALTH,) 12) 13 Defendants.) 14 *** 15 VIDEOCONFERENCE DEPOSITION OF STERLING REAM 16 TAKEN ON BEHALF OF THE PLAINTIFF 17 NOVEMBER 4, 2020 18 *** 19 *** 20 *** 21 *** 22 *** 23 *** 24 *** 25 ***</p>	<p style="text-align: right;">Page 3</p> <p>1 A P P E A R A N C E S 2 For the Plaintiffs: 3 Mr. Ivan Nugent 4 Krigel & Krigel, P.C. 5 4520 Main Street, Suite 700 6 Kansas City, MO 64111 7 tel: (816)756-5800 8 For Defendant Corizon: 9 Mr. Michael L. Matula 10 Ogletree Deakins 11 4520 Main Street, Suite 400 12 Kansas City, Missouri 64111 13 tel: (816)471-1301 14 For Department of Corrections: 15 Ms. Rachel Jag 16 Assistant Attorney General 17 615 E. 13th Street, Suite 401 18 Kansas City, Missouri 64106 19 tel: (816)889-5000 20 Also Present on Zoom: Jenny Meehan 21 Court Reporter: 22 Joann Renee Richardson 23 Alaris Litigation Services 24 711 North Eleventh Street 25 St. Louis, MO 63101 26 314) 644-2191 27 1-800-280-3376</p>
<p style="text-align: right;">Page 2</p> <p>1 THE UNITED STATES DISTRICT COURT 2 FOR THE WESTERN DISTRICT OF MISSOURI 3 WESTERN DIVISION 4 TERRI YOLANDA LABLANCE,) 5) 6 Plaintiff,) 7 vs.) 8) Case# 4:19-cv-00693-BP 9 MISSOURI DEPARTMENT OF) 10 CORRECTIONS AND CORIZON) 11 HEALTH,) 12) 13 Defendants.) 14 *** 15 VIDEOCONFERENCE DEPOSITION OF STERLING REAM, 16 produced, sworn and examined on November 4, 2020, 17 between the hours of 11:36 a.m. and 1:14 p.m. of that 18 day, via videoconference, before Joann Renee Richardson, 19 a Certified Court Reporter within and for the State of 20 Missouri, in a certain cause now pending in the United 21 States District Court - Western District, wherein Terri 22 Yolanda LaBlance is the Plaintiff and Missouri 23 Department of Corrections and Corizon Health are the 24 Defendants; taken on behalf of the Plaintiff. 25 ***</p>	<p style="text-align: right;">Page 4</p> <p>1 I N D E X 2 EXAMINATION BY: PAGE: 3 BY MR. NUGENT 6 4 ***** 5 E X H I B I T S 6 EXHIBIT NOS: PAGE: 7 12 - Teresa McWhorter email 16 8 15 - Jerry Lovelace email 25 9 43 - Auditing Log 18 10 45 - Corrective Action Form Tammie Christopher 39 11 46 - Corrective Action Form Sterling Ream 36 12 47 - Corrective Action Form Tabitha Johnson 41 13 48 - Corrective Action Form Deborah Ritter 43 14 49 - Corrective Action Form Jessica Frizzell 44 15 (Exhibits retained by counsel, not attached.) 16 17 18 19 20 21 22 23 24 25</p>

1 (Pages 1 to 4)

ALARIS LITIGATION SERVICES

www.alaris.us

Phone: 1.800.280.3376

Fax: 314.644.1334

Case 4:19-cv-00693-BP Document 67-1 Filed 12/03/20 Page 3 of 24

<p style="text-align: center;">Page 5</p> <p>1 IT IS HEREBY STIPULATED AND AGREED, by and 2 between counsel for the PLAINTIFF and counsel for the 3 DEFENDANTS that this deposition may be taken in 4 shorthand by Joann Renee Richardson, Certified Court 5 Reporter, and afterwards transcribed into typewriting; 6 and the signature of the witness is expressly reserved. 7 * * * * *</p> <p>8 MR. VIDEOGRAPHER: We are on the record. 9 Today's date is November 4, 2020, and the time is 10 11:36 a.m. This is the video-recorded deposition of 11 Sterling Ream in the matter of Terri Yolanda LaBlance 12 vs. Missouri Department of Corrections and Corizon 13 Health, Case No. 4:19-cv-00693, in United States 14 District Court, Western District of Missouri, Western 15 Division. This deposition is being held via WebEx video 16 conference.</p> <p>17 The reporter's name is Joann Richardson. My 18 name is Chris Chandler. I'm the legal videographer. 19 And we are with Alaris Litigation Services. Today's 20 deposition is being held via videoconference with the 21 court reporter and the witness not appearing in the same 22 room together.</p> <p>23 Would all the attorneys present please 24 introduce themselves, the parties that they represent, 25 and if they agree to this stipulation of the deposition</p>	<p style="text-align: center;">Page 7</p> <p>1 testimony in the case that's been described thus far? 2 A. Yes. 3 Q. All right. Just some housekeeping things. 4 First, the court reporter may have trouble hearing you 5 at times. So, if you would, just make sure you're 6 close to the computer in front of you so that she can 7 hear you and pick you up clearly. Secondly, if you 8 need a break, will you let me know so that we can take 9 that break? 10 A. Sure. 11 Q. My only ask is that you would answer whatever 12 question is before you prior to us going on that break. 13 Okay? 14 A. Okay. 15 Q. If you do not understand any of my questions, can 16 I trust that you will tell me that you don't understand 17 my question? 18 A. Yes. 19 Q. And then, lastly, can I assume that you will not 20 rely on any assistance from Ms. Meehan, who is in the 21 room with you? 22 A. Yes. 23 Q. Is there anyone else in the room with you right 24 now? 25 A. No.</p>
<p style="text-align: center;">Page 6</p> <p>1 taking place in this manner. 2 MR. NUGENT: Good morning. Ivan Nugent on 3 behalf of the Plaintiff, Terri LaBlance, and we consent 4 to the witness and court reporter being in separate 5 locations. 6 MR. MATULA: This is Mike Matula on behalf 7 of Corizon Healthcare. I also agree to the deposition 8 proceeding in this manner. 9 MS. JAG: This is Rachel Jag for the 10 Department of Corrections and we also stipulate and 11 agree to the deposition being taken in this manner. 12 MR. VIDEOGRAPHER: Thank you. Will the 13 court reporter please swear in the witness? And we may 14 proceed. 15 STERLING REAM, 16 being first duly sworn, produced and examined, testified 17 as follows: 18 EXAMINATION 19 QUESTIONS BY MR. NUGENT: 20 Q. Good morning, Ms. Ream. My name is Ivan Nugent 21 and I represent Terri LaBlance. We are here to take 22 your deposition in that case. Hopefully this will not 23 last very long. But, nonetheless, I do have some 24 questions and I'm hoping that you can answer them. Do 25 you understand that you are here today to give</p>	<p style="text-align: center;">Page 8</p> <p>1 Q. All right. And where are you currently? 2 A. I am in the green conference room at 3 Chillicothe Correctional Center. 4 Q. And prior to us starting, you were sworn in by 5 the court reporter to tell the truth. Do you 6 understand that you are obligated to tell the truth 7 today? 8 A. Yes. 9 Q. Great. Who do you work for? 10 A. Corizon Health. 11 Q. And what do you do for Corizon Health? 12 A. I am the director of nursing. 13 Q. How long have you been the director of nursing? 14 A. Almost -- it'll be a year in December. 15 Q. So you became the director of nursing in December 16 of 2019? 17 A. Correct. 18 Q. What was your title prior to becoming the 19 director of nursing? 20 A. I was the health services administrator. 21 Q. When did you become the health services 22 administrator? 23 A. I want to say in May or -- April or May of 24 2018, I think. Yes. 25 Q. When did you start working for Corizon?</p>

2 (Pages 5 to 8)

ALARIS LITIGATION SERVICES

www.alaris.us

Phone: 1.800.280.3376

Fax: 314.644.1334

Case 4:19-cv-00693-BP Document 67-1 Filed 12/03/20 Page 4 of 24

STERLING REAM 11/4/2020

<p style="text-align: center;">Page 9</p> <p>1 A. June of 2010.</p> <p>2 Q. You said June of 20 what?</p> <p>3 A. 2010.</p> <p>4 Q. What was your title prior to becoming health services administrator?</p> <p>5 A. I was an RN staff nurse PRN.</p> <p>6 Q. And is that what you were hired for in June 2010?</p> <p>7 A. No. I was an LPN then.</p> <p>8 Q. Are there any other job titles you've held other than director of nursing, health services administrator, RN, and LPN?</p> <p>9 A. No.</p> <p>10 Q. Was the health services administrator position a management position?</p> <p>11 A. Yes.</p> <p>12 Q. And is the director of nursing position a manager position?</p> <p>13 A. Yes.</p> <p>14 Q. When you became the health services administrator, did you receive a pay raise?</p> <p>15 A. Yes.</p> <p>16 Q. Is the acronym HSA health services administrator?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And then can we agree that DON is the acronym for director of nursing?</p>	<p style="text-align: center;">Page 11</p> <p>1 going to be. Was the pay different in the DON position from the HSA position?</p> <p>2 A. Yes. Sorry.</p> <p>3 Q. That's okay. In your HSA role, from approximately April or May of 2018 until December of 2019, were you responsible for supervising any employees?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. What job titles did you supervise?</p> <p>6 A. RNs, LPNs. I mean, I wasn't directly over providers, but I was the supervisor for the site, if that makes sense.</p> <p>7 Q. It does. Who did you report to when you were the HSA?</p> <p>8 A. Jenny Meehan.</p> <p>9 Q. Is it safe to say for non-providers you were the -- you were the person in charge as the HSA?</p> <p>10 A. Yes.</p> <p>11 Q. When you became the director of nursing, did you have to apply for that position?</p> <p>12 A. I'm not sure if I applied, like an actual written application. No, I don't think I did.</p> <p>13 Q. Okay. Who was the director of nursing prior to you?</p> <p>14 A. Tammie Christopher.</p>
<p style="text-align: center;">Page 10</p> <p>1 A. Correct.</p> <p>2 Q. When you became the director of nursing, did that come with a pay increase?</p> <p>3 A. Yes.</p> <p>4 Q. How much of an increase between the HSA and the DON position?</p> <p>5 A. Well, actually, initially I believe it was the same, I think. Yes, around the same. Very close.</p> <p>6 Q. So did the DON position increase your pay at all?</p> <p>7 A. No, not initially.</p> <p>8 Q. Okay. When did --</p> <p>9 A. If it was, it was very minimal.</p> <p>10 Q. When did your pay increase?</p> <p>11 A. I'm sorry. Are you asking when I became DON?</p> <p>12 Q. Yes.</p> <p>13 A. Well, I guess I don't understand.</p> <p>14 Q. Okay. I don't really care how little or how big the increase was. I just want to know if there was an increase.</p> <p>15 A. There was an increase a few months ago.</p> <p>16 Q. Okay.</p> <p>17 A. That was the only -- but I guess what I was trying to say is that the HSA and DON position was, like, just very close to the same rate of pay.</p> <p>18 Q. Okay. And I don't mean to be technical, but I am</p>	<p style="text-align: center;">Page 12</p> <p>1 Q. And so after she left, you got the job?</p> <p>2 A. Well, no.</p> <p>3 Q. How did you get the job?</p> <p>4 A. She left, put in her notice to leave. I put in my notice to leave. I ended up staying as the HSA longer. Then I put my notice in to leave. And then I talked to the current HSA now who worked at a different institution. She basically said, If I would come on as the HSA, would you be my DON? And I thought about it and said yes.</p> <p>5 Q. What's her name?</p> <p>6 A. Kelley Tipton.</p> <p>7 Q. It sounded like I heard you say you put in your notice to leave twice. Is that accurate?</p> <p>8 A. No.</p> <p>9 Q. Okay.</p> <p>10 A. Well, maybe it is. I'm not sure. I don't know if I did it twice or just extended my -- I really cannot remember.</p> <p>11 Q. Why did you put in -- let's just start with the first time you can remember putting in your notice in 20 -- this would have been 2019; is that right?</p> <p>12 A. Right.</p> <p>13 Q. In 2019, why did you put in your notice the first time?</p>

3 (Pages 9 to 12)

ALARIS LITIGATION SERVICES

www.alaris.us

Phone: 1.800.280.3376

Fax: 314.644.1334

Case 4:19-cv-00693-BP Document 67-1 Filed 12/03/20 Page 5 of 24

STERLING REAM 11/4/2020

Page 13	Page 15
<p>1 A. Stress. It was a lot of stress. I had little 2 kids at home and it was consuming my life, my job 3 was. 4 Q. What about the job was stressful? 5 A. Well, you're a manager of a health services 6 ensuring the population is getting the health 7 services that they need. And not to mention, you 8 know, you have -- you're over the nurses and 9 staffing. And it's a lot. 10 Q. What was your annual salary as the HSA? 11 A. I believe it was 79, around -- approximately. 12 79 and some change. 13 Q. You mentioned the patient population. Correct me if I'm wrong, but Corizon provides healthcare services for inmates in Chillicothe Correctional Center; is that correct? 14 A. Yes. 15 Q. And it's a woman's facility; is that right? 16 A. That's correct. 17 Q. Do you know the racial demographics of the institution? 18 A. No, I do not. 19 Q. Okay. Would you say that most of the patients seen by Corizon are white patients? 20 A. I'm sorry, you cut out with that last part.</p>	<p>1 A. No. 2 Q. When did you first meet Terri LaBlance? 3 A. It was in 2017, probably shortly after she started. 4 Q. Okay. And do you recall what Ms. LaBlance -- what her title was when she was hired? 5 A. Nurse practitioner. 6 Q. Would she be considered a provider? 7 A. Yes. 8 Q. So she didn't report to you, did she? 9 A. No. 10 Q. Ms. Ream, have you had your deposition taken before? 11 A. No. 12 Q. Outside of Ms. LaBlance, have you had any other African American colleagues? 13 A. Yes. 14 Q. Do you know how many? 15 A. Just for Corizon or for DOC, all -- I mean -- 16 Q. For Corizon. 17 A. Okay. That I can recall right now, I think two other. 18 Q. So including Ms. LaBlance, does that make three? 19 A. Yes. 20 Q. Were those other two employed with Corizon prior</p>
Page 14	Page 16
<p>1 Q. Sure. My question is, would you say that the majority of patients seen by Corizon at Chillicothe are Caucasian or white? 2 A. No, I would not say majority. I would say it's probably 50 percent, maybe. 3 Q. 50 percent white. 4 A. Correct. 5 Q. And what's the other 50 percent? 6 A. Hispanic, African American. I mean, I'm not sure the rest, but -- 7 Q. Okay. What's your highest level of education? 8 A. Associate's degree. 9 Q. Are you married? 10 A. Yes. 11 Q. Does your spouse work for the Department of Corrections? 12 A. No. 13 Q. Do you have any relatives that work for the Department of Corrections? 14 A. I do. 15 Q. Can you tell me their names? 16 A. Sherry Walsh. 17 Q. And what does she do? 18 A. She is a cook, I believe. 19 Q. Anyone else?</p>	<p>1 to Ms. LaBlance? 2 A. I'm sorry, prior to what? 3 Q. Prior to Ms. LaBlance. 4 A. Yes. 5 Q. Since Ms. LaBlance is no longer employed with Corizon, have there been any other African Americans that have worked for Corizon at Chillicothe? 6 A. I mean, we have a provider that comes to another institution that would come and help us. So I don't know if he was coming after she left. I can't remember. 7 Q. What's his name? 8 A. Dr. Eucadway. (Phonetic on name.) 9 Q. I'm going to show you some documents. Ms. Ream, do you see a document in front of you with a handwritten 12 in the bottom right-hand corner of it? 10 A. Yes. 11 Q. What I've put in front of you for record purposes is a document that's been previously used in depositions related to this case and it is identified as Deposition Exhibit 12. I am going to start on a page that's been Bates-labeled as Corizon 9. Do you see that in front of you right now? 12 A. Yes. 13 Q. All right. Prior to today have you reviewed any</p>

4 (Pages 13 to 16)

ALARIS LITIGATION SERVICES

www.alaris.us

Phone: 1.800.280.3376

Fax: 314.644.1334

Case 4:19-cv-00693-BP Document 67-1 Filed 12/03/20 Page 6 of 24

<p style="text-align: right;">Page 17</p> <p>1 documents in preparation for your deposition?</p> <p>2 A. Yes.</p> <p>3 Q. What documents did you look at?</p> <p>4 A. This one.</p> <p>5 Q. Any other documents?</p> <p>6 A. Yes.</p> <p>7 Q. What other documents?</p> <p>8 A. My corrective action. There were six total.</p> <p>9 Let's see. This one, my corrective action, an</p> <p>10 email. I think two emails. I think it was an email</p> <p>11 or -- the email from Terri about Judy.</p> <p>12 Q. Email from Terri about duty?</p> <p>13 A. Judy Harkins.</p> <p>14 Q. Got it. Is that the universe of documents that</p> <p>15 you looked at prior to today?</p> <p>16 A. Correct.</p> <p>17 Q. All right. I want to -- I want you to read your</p> <p>18 statement here and let me know when you're finished.</p> <p>19 You can just read it to yourself.</p> <p>20 A. Yes. I'm done.</p> <p>21 Q. Okay. Great. Do you remember this incident</p> <p>22 involving Ms. Barker and Ms. LaBlance?</p> <p>23 A. Yes, I do.</p> <p>24 Q. Were you present for the conversation?</p> <p>25 A. No, I was not.</p>	<p style="text-align: right;">Page 19</p> <p>1 Q. Okay. On December 9, 2017, you accessed</p> <p>2 Ms. LaBlance's charting guide list page, right?</p> <p>3 A. Yes.</p> <p>4 Q. In the previous exhibit we were just looking at,</p> <p>5 which was the -- your statement in response to an</p> <p>6 incident between Ms. Barker and Ms. LaBlance, that was</p> <p>7 in August of 2017. Would you agree?</p> <p>8 A. Yes, I believe so.</p> <p>9 Q. Okay. And then approximately four months later,</p> <p>10 you're looking at the charting guide list page for</p> <p>11 Ms. LaBlance. Can you tell me why?</p> <p>12 A. The current HSA at the time -- I was working</p> <p>13 in the ER. I don't know if it was that same day.</p> <p>14 I'm not sure. But there was some -- she was walking</p> <p>15 into the ER and had said something about Terri's</p> <p>16 criminal record. And, of course, I was surprised.</p> <p>17 And so curiosity because I really couldn't believe</p> <p>18 it.</p> <p>19 Q. What were you curious about?</p> <p>20 A. If it was true.</p> <p>21 Q. Prior to December 9th, did you know whether or</p> <p>22 not Ms. LaBlance had a criminal record?</p> <p>23 A. I don't believe so.</p> <p>24 Q. Do you know?</p> <p>25 A. I'm sorry. What? Do I know what?</p>
<p style="text-align: right;">Page 18</p> <p>1 Q. You said, "After Jenni." What's Jenni's last</p> <p>2 name?</p> <p>3 A. Jenni Preston.</p> <p>4 Q. Does Jenni Preston still work for Corizon?</p> <p>5 A. No.</p> <p>6 Q. Do you remember when she left?</p> <p>7 A. I have no clue.</p> <p>8 Q. All right. Do you recall who asked you to</p> <p>9 prepare this statement?</p> <p>10 A. Yes. Teresa McWhorter.</p> <p>11 Q. Does the statement -- as you've read it today, is</p> <p>12 it the same as it was when you wrote it in 2017?</p> <p>13 A. Yes.</p> <p>14 Q. Thank you. I want to bring up another document.</p> <p>15 Do you see a document in front of you that has the</p> <p>16 heading "Auditing Log Search Results"?</p> <p>17 A. Yes.</p> <p>18 Q. I'll represent to you that this is a list of</p> <p>19 individuals who accessed Ms. LaBlance's medical records</p> <p>20 from the Department of Corrections from January 1 of</p> <p>21 2017 to March 8th of 2019. This has also been</p> <p>22 previously used in depositions and is Deposition</p> <p>23 Exhibit 43. I'm on Page 3 of 4 that is Bates-labeled</p> <p>24 MDOC1942. Do you see your name there at the top?</p> <p>25 A. Uh-huh. Yes.</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Do you know whether or not she did?</p> <p>2 A. I do, but don't know the fullest extent or</p> <p>3 anything. I mean, I don't know -- I know that she</p> <p>4 has a DOC number.</p> <p>5 Q. Let me clear up my question just a little bit.</p> <p>6 The question is, prior to December 9th of 2017, did you</p> <p>7 know that Ms. LaBlance had a criminal record? And I</p> <p>8 believe your answer was that you did not know; is that</p> <p>9 right?</p> <p>10 A. Yes. Correct. I believe so, yes.</p> <p>11 Q. Okay. And so when was the first time that you</p> <p>12 learned that Ms. LaBlance had a criminal record?</p> <p>13 A. It had to be around that time that I looked at</p> <p>14 the face page.</p> <p>15 Q. Is the face page what you see if you're on the</p> <p>16 charting guide list page?</p> <p>17 A. I'm guessing that's what they're calling it,</p> <p>18 yes.</p> <p>19 Q. When you say you're guessing that's what they're</p> <p>20 calling it, who is they?</p> <p>21 A. I mean, it doesn't have a name. It's just</p> <p>22 when you type in the number and the picture and the</p> <p>23 DOC number is there.</p> <p>24 Q. Okay. Who was the person that came into the ER</p> <p>25 and mentioned it that you were referring to a moment</p>

5 (Pages 17 to 20)

ALARIS LITIGATION SERVICES

www.alaris.us

Phone: 1.800.280.3376

Fax: 314.644.1334

Case 4:19-cv-00693-BP Document 67-1 Filed 12/03/20 Page 7 of 24

Page 21	Page 23
<p>1 ago?</p> <p>2 A. Teresa McWhorter.</p> <p>3 Q. What was your impression of Ms. McWhorter's</p> <p>4 comments about Ms. LaBlance's records?</p> <p>5 A. What was my impression?</p> <p>6 Q. Yes.</p> <p>7 A. My impression was disbelief.</p> <p>8 Q. Okay. Did Ms. McWhorter appear to you to be</p> <p>9 surprised as well?</p> <p>10 A. Yes.</p> <p>11 Q. Did Ms. McWhorter tell you how she learned of</p> <p>12 Ms. LaBlance's DOC records?</p> <p>13 A. No.</p> <p>14 Q. Was there anyone else present with you when</p> <p>15 Ms. McWhorter told you about Ms. LaBlance's records?</p> <p>16 A. No.</p> <p>17 Q. So it was just you in the room?</p> <p>18 A. Right.</p> <p>19 Q. What did you do after Ms. McWhorter told you?</p> <p>20 A. Well, I was working in the ER, so I continued</p> <p>21 to work, I believe.</p> <p>22 Q. Okay. Did you tell anyone else what</p> <p>23 Ms. McWhorter had told you?</p> <p>24 A. No, I did not discuss it.</p> <p>25 Q. After she told you, you just looked up</p>	<p>1 A. Yes.</p> <p>2 Q. And you were written up in March of 2019, right?</p> <p>3 A. Yes.</p> <p>4 Q. So that was about a year and a half after you did</p> <p>5 it; is that right?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. How did you feel about being written up</p> <p>8 about something that happened a year and a half ago?</p> <p>9 A. I feel like -- I mean, I felt bad. I've never</p> <p>10 been written up before in my career. You know,</p> <p>11 after -- I mean, I feel like I probably deserved it.</p> <p>12 Q. Do you know how Corizon found out that you</p> <p>13 accessed the record?</p> <p>14 A. No.</p> <p>15 Q. Was it surprising to you that they found out that</p> <p>16 you accessed it?</p> <p>17 A. Surprising? Maybe since it had been so long,</p> <p>18 yes.</p> <p>19 Q. Do you know whether or not any other individuals</p> <p>20 were written up?</p> <p>21 A. Yes.</p> <p>22 Q. Who do you know that was written up?</p> <p>23 A. Well, probably everybody that was on the page</p> <p>24 that accessed it. There were several. I don't</p> <p>25 remember everyone.</p>
Page 22	Page 24
<p>1 Ms. LaBlance in the MOCIS software; is that right?</p> <p>2 A. Right.</p> <p>3 Q. Did you search by name or by number?</p> <p>4 A. I believe name. I wouldn't have had a number.</p> <p>5 Q. What were your hours in December of 2017?</p> <p>6 A. I was PRN.</p> <p>7 Q. Okay. So you worked as needed?</p> <p>8 A. Yes.</p> <p>9 Q. When you worked as needed were you called in to</p> <p>10 shifts, or were you called in for a specific amount of</p> <p>11 time?</p> <p>12 A. It would vary. I would be called in last</p> <p>13 minute or it could have been a scheduled shift. I'm</p> <p>14 not sure.</p> <p>15 Q. So at 4:46 p.m., is that in the middle of a</p> <p>16 shift?</p> <p>17 A. No.</p> <p>18 Q. Is it at the end of the shift?</p> <p>19 A. No. It would be -- I'm assuming that maybe I</p> <p>20 was working 3 to 11, maybe. I'm not sure.</p> <p>21 Q. So what's the shift that's before the 3-to-11</p> <p>22 shift?</p> <p>23 A. Well, it used to be 6:45 to 3 or 7 to 3.</p> <p>24 Q. So you were written up for accessing</p> <p>25 Ms. LaBlance's records, right?</p>	<p>1 Q. Okay. Do you know Judy Harkins?</p> <p>2 A. Yes.</p> <p>3 Q. Does she still work for Corizon?</p> <p>4 A. Yes.</p> <p>5 Q. Do you know whether or not Ms. Harkins was</p> <p>6 written up?</p> <p>7 A. I couldn't tell you for sure, but I think</p> <p>8 anybody who did received corrective action.</p> <p>9 Q. Okay. Is it safe to say that your opinion is</p> <p>10 anybody who did should have been written up?</p> <p>11 A. Yes.</p> <p>12 Q. All right. And tell me what your understanding</p> <p>13 is of why you were written up.</p> <p>14 A. Because I accessed her face page.</p> <p>15 Q. Do you believe that you were written up for</p> <p>16 accessing HIPAA-protected information?</p> <p>17 A. Well, now -- I mean, I didn't think of the</p> <p>18 face page as being a HIPAA violation. But now I</p> <p>19 feel like I -- you know, obviously it was not the</p> <p>20 right thing to do.</p> <p>21 Q. Well, why wasn't it the right thing to do, in</p> <p>22 your opinion?</p> <p>23 A. Because I worked with her and she wasn't a</p> <p>24 patient of mine.</p> <p>25 Q. Okay. So if I'm understanding your testimony</p>

6 (Pages 21 to 24)

ALARIS LITIGATION SERVICES

www.alaris.us

Phone: 1.800.280.3376

Fax: 314.644.1334

Case 4:19-cv-00693-BP Document 67-1 Filed 12/03/20 Page 8 of 24

<p style="text-align: center;">Page 25</p> <p>1 correctly, are you saying because you accessed 2 information that you should not have accessed? 3 A. Right, her face page. Right. 4 Q. Would you refer to her face page as 5 HIPAA-protected information? 6 A. Well, her date of birth is on there. So yes. 7 Q. Ms. Ream, I have tried to put the next document 8 in front of you. It's been used in prior depositions 9 and it is labeled Deposition Exhibit 15. Do you see a 10 15 in front of you? 11 A. Yes. 12 Q. All right. I have scrolled to the bottom of 13 Exhibit 15. It is Corizon 23 and Corizon 24. Is this 14 one that you reviewed prior to your deposition today? 15 A. I believe so, yes. 16 Q. This is an email from Terri LaBlance to you and 17 Dr. Epperson and she copies Jerry Lovelace, Jenny 18 Meehan and Valicia Kirby. Do you see where I am? 19 A. It's really small, but yes. 20 Q. One second. Is that better? 21 A. Yes. 22 Q. Do you remember receiving this email from 23 Ms. LaBlance? 24 A. Yes. 25 Q. Do you see where it says, "The lab tech refused</p>	<p style="text-align: center;">Page 27</p> <p>1 A. Right. Yeah. So it was to me and then 2 Jerry -- Dr. Lovelace and Jenny were cc'd on it. I 3 believe I forwarded it, but maybe I didn't since 4 they were already on it. I'm not sure. 5 Q. So is it safe to say you don't know whether you 6 forwarded it or not? 7 A. No. 8 Q. Okay. The date that Terri sent this is June 6th 9 of 2018. And we were just looking at Exhibit 43 that 10 showed you accessing Ms. LaBlance's face sheet about 11 seven months before. 12 A. Uh-huh. 13 Q. Is that accurate? 14 A. I think so, yes. 15 Q. In between December of '17 and June 6, 2018, do 16 you recall whether you told anyone about Ms. LaBlance's 17 Department of Corrections records? 18 A. No. 19 Q. Did you tell anyone about her records? 20 A. I don't believe so. 21 Q. When you say you don't believe so, are you sure? 22 A. I don't think I would have discussed it with 23 anybody. The rumor was flying around with the 24 nurses. I'd heard people mention it and talk about 25 it. But, no, I do not believe that I discussed it</p>
<p style="text-align: center;">Page 26</p> <p>1 to complete the requisition and took the specimen to my 2 office and sat it on my desk while stating, 'I told you 3 not to sit that on my desk'?" 4 A. Yes, I see that. 5 Q. All right. Do you recall what the specimen was? 6 A. It was urine. 7 Q. In a small cup? 8 A. Yes. 9 Q. And is that cup see-through? 10 A. Yes. 11 Q. Did that cup have a lid on it; do you know? 12 A. I do not know that. I'm assuming it did. 13 Q. Okay. Ms. Ream, I just scrolled through all of 14 the emails that are present here and I did not see that 15 you emailed anything related to this incident. 16 A. No. 17 Q. Do you recall whether you did write an email 18 related to this incident? 19 A. No, I don't believe so. I forwarded the 20 emails to my supervisor. 21 Q. You forwarded -- 22 A. I believe that -- I'm sorry. Can you scroll 23 back up? I think it was to me, wasn't it, initially 24 from Terri? 25 Q. So this is the first email on Corizon 23 and 24.</p>	<p style="text-align: center;">Page 28</p> <p>1 with anybody, that I can remember. 2 Q. With regards to those rumors, when did you start 3 hearing those rumors? 4 A. Well, about the time that I heard them. 5 Q. So around December of 2017? 6 A. Correct. 7 Q. And did you hear those rumors throughout 2018? 8 A. No, I don't believe so. 9 Q. Okay. Did you hear those rumors prior to 10 Ms. LaBlance leaving Corizon? 11 A. Yes. 12 Q. Ms. LaBlance left in February of 2019. Did you 13 hear those rumors in January or February of 2019 or 14 prior to? 15 A. Probably around January or February -- well, 16 I'm assuming -- no, I think it was more like 17 February. 18 Q. Okay. When you say it was rumors discussed or, 19 you know -- the nurses were a part of this or whatnot, 20 which nurses? 21 A. In 20 -- 22 Q. Whenever you heard these rumors? 23 A. Initially in December? 24 Q. Yeah. 25 A. Everyone at the time. I mean, I don't want to</p>

7 (Pages 25 to 28)

ALARIS LITIGATION SERVICES

STERLING REAM 11/4/2020

<p style="text-align: right;">Page 29</p> <p>1 say everyone, but I can't remember specifically who.</p> <p>2 Q. Okay. How many Corizon employees were there at</p> <p>3 Chillicothe in December of '17?</p> <p>4 A. That I do not know.</p> <p>5 Q. Did it feel like everyone was talking about in</p> <p>6 December of 2017?</p> <p>7 A. Well, maybe not everybody. It didn't last</p> <p>8 long.</p> <p>9 Q. How long did it last?</p> <p>10 A. I don't know. I can't remember. I had</p> <p>11 forgotten about it from then until February of 2019,</p> <p>12 probably.</p> <p>13 Q. Did it concern you at the time that employees</p> <p>14 were talking about a rumor like that?</p> <p>15 A. Yes.</p> <p>16 Q. Did you do anything about it?</p> <p>17 A. Maybe I misunderstood the question. I was</p> <p>18 only a staff nurse at that time.</p> <p>19 Q. So the fact that you were only a staff nurse at</p> <p>20 that time, what does that mean with regards to whether</p> <p>21 you could have done anything about it or not?</p> <p>22 A. Done anything about people talking about it?</p> <p>23 Q. Yes.</p> <p>24 A. Well, my boss at the time was talking about</p> <p>25 it. So she knew. And I assumed if she told a staff</p>	<p style="text-align: right;">Page 31</p> <p>1 complaining about; is that right?</p> <p>2 A. Yes.</p> <p>3 Q. Do you know whether Ms. Harkins was a part of the</p> <p>4 group that you were discussing with regards to the</p> <p>5 rumors being spread around about Ms. LaBlance and her</p> <p>6 Department of Corrections record?</p> <p>7 A. No.</p> <p>8 Q. Do you know any of the names that were discussing</p> <p>9 Ms. LaBlance's criminal records around December of</p> <p>10 2017, other than Ms. McWhorter?</p> <p>11 A. No.</p> <p>12 Q. Okay. With regards to the nurses in 2017 -- in</p> <p>13 December of 2017, were there more than ten nurses?</p> <p>14 A. I would think so, yes.</p> <p>15 Q. Were there more than 20 nurses?</p> <p>16 A. I am not sure. I don't know.</p> <p>17 Q. Okay. Were there more than 30 nurses?</p> <p>18 A. I do not know.</p> <p>19 Q. Okay. Do you know whether there were more than</p> <p>20 40?</p> <p>21 A. No, I do not know.</p> <p>22 Q. Do you know if there were more than 50 nurses?</p> <p>23 A. No, I do not know.</p> <p>24 Q. Okay. Do you know if there were more than 100</p> <p>25 nurses?</p>
<p style="text-align: right;">Page 30</p> <p>1 nurse, she probably told more than just me. I mean,</p> <p>2 she's my supervisor. She was my supervisor. So,</p> <p>3 you know, she'd already knew about it. I don't know</p> <p>4 who I would report it to.</p> <p>5 Q. And your boss was Teresa McWhorter, right?</p> <p>6 A. Correct.</p> <p>7 Q. Who was Teresa McWhorter's supervisor?</p> <p>8 A. I believe Jenny -- I'm not sure at that time</p> <p>9 if it was Jenny or Pat.</p> <p>10 Q. Okay. Could you have told Jenny or Pat about the</p> <p>11 rumors that you were hearing?</p> <p>12 A. Well, at the time probably I didn't think to</p> <p>13 do that. I didn't know them. They weren't my</p> <p>14 supervisors. And at that time, I -- no.</p> <p>15 Q. In June of 2018, when Terri LaBlance sends you</p> <p>16 this email that you did not forward, did you tell</p> <p>17 anyone then about the rumors that you had heard and --</p> <p>18 A. No.</p> <p>19 Q. -- the fact that it might be relevant to this</p> <p>20 email?</p> <p>21 A. No.</p> <p>22 Q. Okay. Do you see this email here that you're</p> <p>23 copied on from Jenny Meehan? It says, "I have</p> <p>24 discussed this with Ms. LaBlance and Judy Harkins."</p> <p>25 Judy Harkins is the lab tech that Ms. LaBlance is</p>	<p style="text-align: right;">Page 32</p> <p>1 A. No. There was not more than 100, no.</p> <p>2 Q. So there weren't more than 100 nurses?</p> <p>3 A. No. I don't know the number of staff that</p> <p>4 they had at that time.</p> <p>5 Q. I understand you don't know the exact number.</p> <p>6 I'm asking if you know whether there were more than</p> <p>7 ten.</p> <p>8 A. Probably.</p> <p>9 Q. Were there more than 20?</p> <p>10 MR. MATULA: Object to form. You just asked</p> <p>11 these exact same questions. Go ahead.</p> <p>12 Q. (By Mr. Nugent) You can answer.</p> <p>13 A. I'm sorry? Somebody was talking. I didn't</p> <p>14 hear.</p> <p>15 Q. So your attorney just made an objection for the</p> <p>16 record, but you can answer the question. So were there</p> <p>17 more than 20 nurses?</p> <p>18 A. I do not know. I don't have an exact count,</p> <p>19 so therefore I can't confirm how many nurses there</p> <p>20 were. If there was more than ten, I do believe</p> <p>21 there was. If there was more than 20, I'm not sure.</p> <p>22 Q. That's helpful. Thank you.</p> <p>23 A. Okay.</p> <p>24 Q. As a nurse for Corizon at the Chillicothe</p> <p>25 facility, do you utilize the MOCIS software daily?</p>

8 (Pages 29 to 32)

ALARIS LITIGATION SERVICES

www.alaris.us

Phone: 1.800.280.3376

Fax: 314.644.1334

Case 4:19-cv-00693-BP Document 67-1 Filed 12/03/20 Page 10 of 24

STERLING REAM 11/4/2020

Page 33	Page 35
<p>1 A. Yes.</p> <p>2 Q. All right. Ms. Ream, I'm going to ask you if you know a number of names. And then if you do, I'll have a couple of follow-ups. Do you know Deborah Ritter?</p> <p>5 A. Yes.</p> <p>6 Q. Is she still employed with Corizon?</p> <p>7 A. No.</p> <p>8 Q. Do you know Megan Rex?</p> <p>9 A. Yes.</p> <p>10 Q. Do you know Jessica Frizzell?</p> <p>11 A. Yes.</p> <p>12 Q. Is she still employed?</p> <p>13 A. Yes.</p> <p>14 Q. Do you know Brandon Doss?</p> <p>15 A. No, I do not.</p> <p>16 Q. Okay. Do you know Lori Switzer?</p> <p>17 A. Yes.</p> <p>18 Q. Do you know Brandy Baker?</p> <p>19 A. Yes.</p> <p>20 Q. Do you know whether Brandy is still employed with Corizon?</p> <p>22 A. No, she is not.</p> <p>23 Q. Do you know Shannon Burris?</p> <p>24 A. Yes.</p> <p>25 Q. Do you know Teresa Hamilton?</p>	<p>1 A. Amanda.</p> <p>2 Q. What's Amanda's last name?</p> <p>3 A. Koenig.</p> <p>4 Q. Is she still employed by Corizon?</p> <p>5 A. Yes.</p> <p>6 Q. What's her title?</p> <p>7 A. She's a dental assistant.</p> <p>8 Q. Do you know when Ms. Koenig started with Corizon?</p> <p>9 A. I do not.</p> <p>10 Q. Okay. Do you know April Wolf?</p> <p>11 A. Yes.</p> <p>12 Q. Does April work for the Department of Corrections?</p> <p>14 A. Yes.</p> <p>15 Q. Do you know Dustin Lybarger?</p> <p>16 A. Yes, I believe so. I don't -- I know last names more than I know first names. So I'm not positive that that's the same person, but I think it is.</p> <p>20 Q. What about Bradley Richards?</p> <p>21 A. I don't know who that is.</p> <p>22 Q. Okay. If I told you that Dustin Lybarger was a Department of Corrections employee, would that be the person that you believe you know?</p> <p>24 A. I think so, yes.</p>
Page 34	Page 36
<p>1 A. Yes.</p> <p>2 Q. Do you know whether Teresa Hamilton was one of the nurses talking about Ms. LaBlance's Department of Corrections records?</p> <p>5 A. I'm not -- could possibly, yes. I'm not sure if it was her or not.</p> <p>7 Q. Okay. Do you know Tabitha Johnson?</p> <p>8 A. Yes.</p> <p>9 Q. Do you know whether she was one of the nurses talking about Ms. LaBlance's Department of Corrections records?</p> <p>12 A. I don't know.</p> <p>13 Q. Do you know Rachel Rempel?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Is she still employed?</p> <p>16 A. Yes.</p> <p>17 Q. I've got a different list of names here I want to ask you about. Do you know Nicholas Koenig?</p> <p>19 A. I believe so.</p> <p>20 Q. Last name is spelled K-O-E-N-I-G.</p> <p>21 A. I think, yes.</p> <p>22 Q. How do you know Nicholas?</p> <p>23 A. If it's the same -- I think that's a husband to an employee.</p> <p>25 Q. Which employee?</p>	<p>1 Q. Do you know a Jeff Parque? (Phonetic on name.)</p> <p>2 A. Yes.</p> <p>3 Q. Department of Corrections employee?</p> <p>4 A. Yes.</p> <p>5 Q. Mindy Rhodes?</p> <p>6 A. No, I don't know that person.</p> <p>7 Q. What about Ashton Christopher?</p> <p>8 A. Yes.</p> <p>9 Q. A DOC employee?</p> <p>10 A. Yes.</p> <p>11 Q. And Philip Bower?</p> <p>12 A. I do not know who that is.</p> <p>13 Q. Any of the DOC names that I just read off, do you socialize outside of the workplace with any of them?</p> <p>15 A. No.</p> <p>16 Q. Ms. Ream, have you looked at any other DOC records out of curiosity in the same way in which you looked at Ms. LaBlance's records?</p> <p>19 A. No.</p> <p>20 Q. You should have a document on your screen. It's been marked as Deposition Exhibit 46. Do you see that?</p> <p>22 A. Yes.</p> <p>23 Q. All right. It is Bates-labeled Corizon 1006. Can you identify what Exhibit 46 is, please?</p> <p>24 A. It's my corrective action.</p>

9 (Pages 33 to 36)

ALARIS LITIGATION SERVICES

www.alaris.us

Phone: 1.800.280.3376

Fax: 314.644.1334

Case 4:19-cv-00693-BP Document 67-1 Filed 12/03/20 Page 11 of 24

STERLING REAM 11/4/2020

<p style="text-align: right;">Page 37</p> <p>1 Q. Is this one of the documents that you reviewed 2 prior to today? 3 A. Yes. 4 Q. All right. I asked you a couple of questions 5 about it already, but you received this on March 25, 6 2019; is that right? 7 A. Yes. 8 Q. And is that your signature there? 9 A. Yes. 10 Q. Okay. To make sure that I have my timeline 11 right, in December of 2017 when you accessed 12 Ms. LaBlance's record, you were a staff nurse at that 13 point; is that right? 14 A. Correct. 15 Q. And then in April you had – in April of 2018 you 16 became the HSA, right? 17 A. Around that time, yes. 18 Q. Did you apply for the position -- for the HSA 19 position? 20 A. Yes. 21 Q. Okay. Filled out an application and everything? 22 A. Yes. 23 Q. Did you have to interview for that position? 24 A. Yes, I did. 25 Q. Do you remember who you interviewed with?</p>	<p style="text-align: right;">Page 39</p> <p>1 Q. Did you complete the HIPAA training? 2 A. I did. 3 Q. Outside of reviewing the Details of Current 4 Incident and the expectations discussed, was there any 5 other conversation with you and Ms. Meehan about this 6 write-up? 7 A. Not that I can recall. 8 Q. Did you offer a rebuttal to Ms. Meehan about the 9 write-up? 10 A. No. 11 Q. Did you agree with the write-up? 12 A. Yes. 13 Q. Did you sit in on anyone else's reprimand as a 14 result of the individuals accessing Ms. LaBlance's 15 records? 16 A. Yes. I had to give the employees that were 17 underneath me, I had to give them their write-ups. 18 Q. Do you recall who that was? 19 A. I don't. There was several. 20 Q. Do you see Exhibit 45 in front of you? 21 A. Yes. 22 Q. And this is Corizon 1005. Do you see where it 23 says "witness signature"? 24 A. Yes. 25 Q. Is that your signature?</p>
<p style="text-align: right;">Page 38</p> <p>1 A. I interviewed with Jenny and Cindy Schupp. 2 Jenny Meehan and Cindy Schupp. 3 Q. Thank you. Who issued this reprimand to you? 4 A. Jenny Meehan. 5 Q. Okay. I'm looking at the Details of Current 6 Incident section here. Did she tell you how she was 7 notified about your accessing the face sheet? 8 A. No. 9 Q. And I assume that Ms. Meehan met with you 10 face-to-face about this; is that right? 11 A. Yes. 12 Q. Was there anyone else present in that meeting? 13 A. Well, Tammie and I shared an office at that 14 time. I think Tammie was in there, maybe. I think 15 so. 16 Q. So you, Tammie Christopher and Jenny Meehan? 17 A. Yes. 18 Q. Okay. What did Ms. Meehan tell you in this 19 meeting on March 25th? 20 A. Well, the Details of Current Incident was 21 read. 22 Q. So this paragraph was read to you here, the 23 Details of Current Incident? 24 A. Right. And the expectations to complete the 25 HIPAA training.</p>	<p style="text-align: right;">Page 40</p> <p>1 A. Yes. 2 Q. Okay. And this is Tammie Christopher's 3 Corrective Action Form. Is she someone that you had to 4 sit in on with regards to giving discipline? 5 A. Yes. 6 Q. And why was Ms. Christopher disciplined? 7 A. Because of the same thing. 8 Q. That you were disciplined for? 9 A. Correct. 10 Q. Did anyone tell you why you had to sit in on 11 Ms. Christopher's reprimand? 12 A. Well, I was her direct supervisor at the time. 13 Q. So on the same date that you were reprimanded, 14 you sat in on these other reprimands; is that accurate? 15 A. Yes. 16 Q. Okay. In discussing why Ms. Christopher was 17 reprimanded, did you have knowledge of when 18 Ms. Christopher accessed Ms. LaBlance's records? 19 A. No. 20 Q. Were you a part of recommending the level of 21 discipline that Ms. Christopher received? 22 A. No. 23 Q. Who made that decision? 24 A. I believe -- I'm not sure. Maybe Jenny. I 25 don't know.</p>

10 (Pages 37 to 40)

ALARIS LITIGATION SERVICES

www.alaris.us

Phone: 1.800.280.3376

Fax: 314.644.1334

Case 4:19-cv-00693-BP Document 67-1 Filed 12/03/20 Page 12 of 24

<p style="text-align: right;">Page 41</p> <p>1 Q. Did you feel like the first written counseling 2 was the appropriate level of discipline? 3 A. Yes. 4 Q. I'm going to clarify. Do you feel that that was 5 the appropriate level of discipline for 6 Ms. Christopher? 7 A. Yes. 8 Q. Okay. That's also the same level of discipline 9 that you received. Do you feel that it was the 10 appropriate level for you? 11 A. Yes. 12 Q. Why do you believe that it was the appropriate 13 level for you? 14 A. Why do I believe it was the appropriate level 15 for me? Because I did not access a medical record. 16 It was a face sheet. 17 Q. Okay. Do you see Exhibit 46 in front of you? 18 A. Yes. 19 Q. That was yours. Apologies. Do you see Exhibit 20 47? 21 A. Yes. 22 Q. Exhibit 47 is Corizon 1003. Is that your 23 signature there on the manager's line? 24 A. Yes. 25 Q. Okay. On Tammie Christopher's, your signature</p>	<p style="text-align: right;">Page 43</p> <p>1 anyone else in the room other than you, Tabitha, and 2 Tammie Christopher? 3 A. No. 4 Q. Do you recall what you said to Ms. Johnson about 5 why she was being written up? 6 A. I read the Details of Current Incident and the 7 expectations discussed. 8 Q. Did she ask you any questions? 9 A. No, I don't believe so. I don't believe 10 anybody did. 11 Q. Was there anybody that disagreed with being 12 written up for accessing Ms. LaBlance's records? 13 A. No, I don't believe so. Not that I can 14 recall. 15 Q. Do you see Exhibit 48 in front of you? 16 A. Yes. 17 Q. Do you have an Exhibit 48 in front of you? 18 A. Yes. 19 Q. All right. This is the Corrective Action Form 20 for Deborah Ritter. Is that your signature there on 21 the manager's signature line? 22 A. Yes. 23 Q. And is that Tammie Christopher below you? 24 A. Yes. 25 Q. Was Ms. Ritter also being written up for</p>
<p style="text-align: right;">Page 42</p> <p>1 was on the witness signature line. Do you know why -- 2 do you know why there's a difference? 3 A. Well, because Tammie is not my supervisor, or 4 was not. 5 Q. Was Tabitha someone that you sat in on the first 6 written counseling discipline session? 7 A. Yes. Tammie and I gave the corrective actions 8 to the employees. 9 Q. Okay. So you and Tammie Christopher gave Tabitha 10 Johnson this corrective action form? 11 A. Yes. We both signed it. 12 Q. Is that Tammie Christopher's signature on the 13 bottom there? 14 A. Yes. 15 Q. And I think we said that's yours in the middle; 16 is that right? 17 A. Yes. 18 Q. Did you believe that the first written counseling 19 was the appropriate level of discipline for Tabitha 20 Johnson? 21 A. Yes. 22 Q. Why is that? 23 A. Because it says that she accessed the face sheet. 25 Q. When you met with Tabitha Johnson, was there</p>	<p style="text-align: right;">Page 44</p> <p>1 accessing Ms. LaBlance's Department of Corrections 2 records? 3 A. Her face sheet, yes. 4 Q. Okay. Did you agree with this level of 5 discipline for Ms. Ritter? 6 A. Yes. 7 Q. Do you know who from Corizon looked into the 8 employees that accessed Ms. LaBlance's records? 9 A. I do not. 10 Q. Were you presented with these corrective action 11 forms and told to present them to the employees? 12 A. Yes. 13 Q. And that was done by Jenny Meehan; is that right? 14 A. Right. 15 Q. Was there anyone else present when Jenny Meehan 16 told you to give these corrective action forms? 17 A. I believe Tammie was. 18 Q. Do you have an Exhibit 49 in front of you? 19 A. Yes. 20 Q. This is Corizon 1004. Is that your signature 21 under the manager's signature line? 22 A. Yes. 23 Q. And is that Tammie Christopher below you? 24 A. Yes. 25 Q. And this is the corrective action form for</p>

11 (Pages 41 to 44)

ALARIS LITIGATION SERVICES

www.alaris.us

Phone: 1.800.280.3376

Fax: 314.644.1334

Case 4:19-cv-00693-BP Document 67-1 Filed 12/03/20 Page 13 of 24

Page 45	Page 47
<p>1 Jessica Frizzell; is that right?</p> <p>2 A. Yes.</p> <p>3 Q. I assume you agreed with the level of discipline 4 given to Ms. Frizzell.</p> <p>5 A. Yes.</p> <p>6 Q. I believe that that's all of the discipline forms 7 that I was given. Do you recall whether there was 8 anyone else that was disciplined for accessing 9 Ms. LaBlance's records?</p> <p>10 A. It seems that there was more than that.</p> <p>11 Q. Okay. When you say it seems like there was more 12 than that, can you tell me why you think that?</p> <p>13 A. Because I'm pretty sure there was several.</p> <p>14 Q. Who else?</p> <p>15 A. I don't know, but it seems like there was 16 more. I could be wrong, but it seemed like there 17 was more.</p> <p>18 Q. When you say it seems like there was more, more 19 people that report to you?</p> <p>20 A. Right.</p> <p>21 Q. Okay. Are you aware of any other Corizon 22 employees having been written up for accessing records 23 of non-patients?</p> <p>24 A. Not that I know of.</p> <p>25 Q. In talking to Ms. Christopher this morning, she</p>	<p>1 was. I'm not positive.</p> <p>2 Q. Okay. What did Ms. Epperson tell you about those 3 records?</p> <p>4 A. She just said, "She has a criminal background 5 and I'm her collaborating physician." She was more 6 expressing that she was hurt that she wasn't told, 7 because her and Terri were very good friends. And 8 basically that, you know, if she was the 9 collaborating physician, she should have been aware 10 of that. And I directed her to the regional office 11 because I was not -- I wasn't going to discuss it.</p> <p>12 Q. In mid February when Dr. Epperson had this 13 conversation with you, you knew that Ms. LaBlance had a 14 criminal record, right?</p> <p>15 A. I had known, yes.</p> <p>16 Q. Why didn't you want to discuss it with 17 Dr. Epperson?</p> <p>18 A. I didn't think it was my place.</p> <p>19 Q. Prior to this mid February conversation with 20 Dr. Epperson, did you have any conversations with 21 Dr. Epperson about Ms. LaBlance and whether or not 22 those two got along?</p> <p>23 A. Whether they got along or not? Val, 24 Dr. Epperson and Terri were all very close. Good 25 friends.</p>
Page 46	Page 48
<p>1 mentioned that Val Kirby and/or Dr. Epperson may have 2 come into the office that you and Ms. Christopher 3 shared and talked about Ms. LaBlance's records in the 4 MOCIS system. Do you recall something like that 5 happening?</p> <p>6 A. Well, I don't know that it was in the MOCIS 7 system. It was more of -- it was discovered by them 8 that she had a record and asked me if I knew about 9 that.</p> <p>10 Q. Who asked you if you knew about that?</p> <p>11 A. Dr. Epperson.</p> <p>12 Q. When did Dr. Epperson ask you?</p> <p>13 A. It must have been in mid February, probably. 14 Somewhere in there.</p> <p>15 Q. Why does that stick out to you, mid February?</p> <p>16 A. Because that's when -- it was around the 17 time -- well, Terri's last day, around that time.</p> <p>18 Q. Okay. Prior to mid February, did you have 19 any other conversations with Ms. Kirby or Dr. Epperson 20 about Ms. LaBlance's records?</p> <p>21 A. No.</p> <p>22 Q. Who was present when Dr. Epperson was talking to 23 you about Ms. LaBlance's records?</p> <p>24 A. Maybe Tammie. We share an office, so chances 25 were good she was in there, but I'm not sure she</p>	<p>1 Q. Okay. Was Dr. Epperson also good friends with 2 Tammie Christopher?</p> <p>3 A. I wouldn't say good friends, no. We didn't -- 4 I don't think Tammie -- no.</p> <p>5 Q. So earlier we looked at the corrective action 6 form for Jessica Frizzell and we saw your signature on 7 the manager's signature line. Ms. Frizzell was a 8 dental assistant; is that right?</p> <p>9 A. Right.</p> <p>10 Q. So did the dental non-providers report to you?</p> <p>11 A. Yes.</p> <p>12 Q. And the rumors that you referenced earlier, were 13 those rumors also extending to the dental staff?</p> <p>14 A. I don't know for sure. Probably. I would 15 assume.</p> <p>16 MR. MATULA: Ivan, we've been going for 17 about an hour or so. Is this now a decent time for a 18 little break? How much more time do you think?</p> <p>19 MR. NUGENT: We can take a break. That's 20 fine. Let's just go off the record.</p> <p>21 MR. VIDEOGRAPHER: We're going off the 22 record. The time is 1:02 p.m.</p> <p>23 (Off the record.)</p> <p>24 _____</p> <p>25 (Back on the record.)</p>

12 (Pages 45 to 48)

ALARIS LITIGATION SERVICES

www.alaris.us

Phone: 1.800.280.3376

Fax: 314.644.1334

Case 4:19-cv-00693-BP Document 67-1 Filed 12/03/20 Page 14 of 24

STERLING REAM 11/4/2020

<p>1 MR. VIDEOGRAPHER: We are back on the 2 record. The time is 1:10 p.m.</p> <p>3 Q. (By Mr. Nugent) Ms. Ream, can you hear me?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. We just took a short break. We're back.</p> <p>6 Do you understand that you are still under oath?</p> <p>7 A. Yes.</p> <p>8 Q. I've got just a few more questions and I will be 9 done. Let me share a document with you. You should 10 have in front of you Exhibit 43. We've looked at it 11 before. Do you have that?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And, again, this is the audit log of 14 individuals who accessed Ms. LaBlance's records. And I 15 want to go to yours really quick. If you remember, 16 your entry on December 9th shows that you accessed the 17 charting guide list page. Would you agree with me that 18 that's the face sheet?</p> <p>19 A. Yes.</p> <p>20 Q. And I believe your testimony is that that is 21 not – it doesn't contain HIPAA information. That's 22 your understanding; is that right?</p> <p>23 A. Well, yes. It doesn't have any medical 24 information on the face sheet.</p> <p>25 Q. Judy Harkins reported to you in March of 2019,</p>	<p>1 A. Yes, I think so.</p> <p>2 Q. Have you told the truth today?</p> <p>3 A. Yes, I have.</p> <p>4 MR. NUGENT: Thank you. I don't have 5 anything further.</p> <p>6 THE WITNESS: Thank you.</p> <p>7 MS. JAG: I have no questions at this time 8 either.</p> <p>9 MR. MATULA: I have no questions at this 10 time. We'll have the witness read and sign and you can 11 send it through me. Sterling, you're done.</p> <p>12 THE WITNESS: Okay. Thank you.</p> <p>13 MR. VIDEOGRAPHER: That concludes today's 14 deposition of Sterling Ream. We're going off the 15 record. The time is 1:14 p.m.</p> <p>16 [The deposition was concluded at 1:14 p.m.]</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 50</p> <p>1 right?</p> <p>2 A. Reported to me?</p> <p>3 Q. She was one of the employees that reported to you 4 or was a subordinate of yours?</p> <p>5 A. Oh. Yes. Yeah.</p> <p>6 Q. Okay. And here it says that Judy Harkins 7 accessed on February 20th at 7:33 a.m. the medication 8 order list page. Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. Would you agree with me that the medication order 11 list page likely has medical information that's 12 protected by HIPAA?</p> <p>13 A. It could.</p> <p>14 Q. Okay. You didn't sit in on a reprimand meeting 15 with Ms. Harkins, did you?</p> <p>16 A. I don't believe -- not that I remember. I'm 17 not sure.</p> <p>18 Q. If I told you that I've asked Corizon for 19 everyone that's been reprimanded and they told me that 20 Judy Harkins was not, would that surprise you?</p> <p>21 A. It would.</p> <p>22 Q. Ms. Ream, are there any questions that you'd like 23 to revisit?</p> <p>24 A. I don't think so.</p> <p>25 Q. Have you understood all of my questions?</p>

13 (Pages 49 to 52)

ALARIS LITIGATION SERVICES

www.alaris.us

Phone: 1.800.280.3376

Fax: 314.644.1334

Case 4:19-cv-00693-BP Document 67-1 Filed 12/03/20 Page 15 of 24

STERLING REAM 11/4/2020

Page 53	Page 55
<p>1 ALARIS LITIGATION SERVICES 2 November 20, 2020 3 Mr. Michael L. Matula 4 Ogletree Deakins 4 4520 Main Street, Suite 400 5 Kansas City, Missouri 64111 5 6 IN RE: TERRI YOLANDA LABLANCE v. MISSOURI 6 DEPARTMENT OF CORRECTIONS AND CORIZON HEALTH 7 Dear Mr. Matula, 8 Please find enclosed your copies of the deposition of 9 STERLING REAM taken on November 4, 2020 in the 10 above-referenced case. Also enclosed is the original 10 signature page and errata sheets. 11 12 Please have the witness read your copy of the 13 transcript, indicate any changes and/or corrections 14 desired on the errata sheets, and sign the signature 15 page before a notary public. 16 17 Please return the errata sheets and notarized 18 signature page within 30 days to our office at 711 N 19 11th Street, St. Louis, MO 63101 for filing. 20 21 Sincerely, 22 23 Joann Renee Richardson 24 25</p>	<p>1 STATE OF _____) 2 COUNTY OF _____) 3 4 I, STERLING REAM, do hereby certify: 5 That I have read the foregoing deposition; 6 That I have made such changes in form 7 and/or substance to the within deposition as might 8 be necessary to render the same true and correct; 9 That having made such changes thereon, I 10 hereby subscribe my name to the deposition. 11 I declare under penalty of perjury that the 12 foregoing is true and correct. 13 Executed this _____ day of _____, 14 20____, at _____. 15 16 17 18 19 _____ 20 STERLING REAM 21 22 _____ 23 NOTARY PUBLIC 23 My Commission Expires: 24 100180 25</p>
<p>1 2 ERRATA SHEET 2 Witness Name: STERLING REAM 3 Case Name: TERRI YOLANDA LABLANCE v. MISSOURI 3 DEPARTMENT OF CORRECTIONS AND CORIZON HEALTH 3 Date Taken: NOVEMBER 4, 2020 4 5 Page #_____ Line #_____ 6 Should read: _____ 7 Reason for change: _____ 8 9 Page #_____ Line #_____ 10 Should read: _____ 11 Reason for change: _____ 12 13 Page #_____ Line #_____ 14 Should read: _____ 15 Reason for change: _____ 16 17 Page #_____ Line #_____ 18 Should read: _____ 19 Reason for change: _____ 20 21 Page #_____ Line #_____ 22 Should read: _____ 23 Reason for change: _____ 24 25 Witness Signature: _____</p>	

14 (Pages 53 to 55)

ALARIS LITIGATION SERVICES

www.alaris.us

Phone: 1.800.280.3376 Case 4:19-cv-00693-BP Document 67-1 Filed 12/03/20 Page 16 of 24

Fax: 314.644.1334

A a.m 2:10 5:10 50:7 above-refere... 53:9 access 41:15 accessed 18:19 19:1 23:13,16 23:24 24:14 25:1,2 37:11 40:18 42:23 44:8 49:14,16 50:7 accessing 22:24 24:16 27:10 38:7 39:14 43:12 44:1 45:8,22 accurate 12:14 27:13 40:14 acronym 9:22 9:25 action 4:10,11,12 4:13,14 17:8,9 24:8 36:25 40:3 42:10 43:19 44:10,16 44:25 48:5 actions 42:7 actual 11:21 administrator 8:20,22 9:5,11 9:13,20,22 African 14:9 15:16 16:6 ago 10:20 21:1 23:8 agree 5:25 6:7 6:11 9:24 19:7 39:11 44:4 49:17 50:10 agreed 5:1 45:3 ahead 32:11 Alaris 3:21 5:19 53:1 Amanda 35:1	Amanda's 35:2 American 14:9 15:16 Americans 16:6 amount 22:10 and/or 46:1 53:13 55:7 annual 13:10 answer 6:24 7:11 20:8 32:12,16 anybody 24:8 24:10 27:23 28:1 43:10,11 Apologies 41:19 appear 21:8 appearing 5:21 application 11:22 37:21 applied 11:21 apply 11:20 37:18 appropriate 41:2,5,10,12,14 42:19 approximately 11:5 13:11 19:9 April 8:23 11:5 35:10,12 37:15 37:15 Ashton 36:7 asked 18:8 32:10 37:4 46:8,10 50:18 asking 10:14 32:6 assistance 7:20 assistant 3:10 35:7 48:8 Associate's 14:12 assume 7:19 38:9 45:3 48:15 assumed 29:25 assuming 22:19 26:12 28:16	attached 4:15 attorney 3:10 32:15 attorneys 5:23 audit 49:13 Auditing 4:9 18:16 August 19:7 aware 45:21 47:9 <hr/> B B 4:5 back 26:23 48:25 49:1,5 background 47:4 bad 23:9 Baker 33:18 Barker 17:22 19:6 basically 12:8 47:8 Bates-labeled 16:22 18:23 36:23 becoming 8:18 9:4 behalf 1:12 2:17 6:3,6 believe 10:7 13:11 14:24 19:8,17,23 20:8,10 21:21 22:4 24:15 25:15 26:19 26:22 27:3 27:20,21,25 28:8 30:8 32:20 34:19 35:16,24 assume 7:19 40:24 41:12,14 42:18 43:9,9 43:13 44:17 45:6 49:20 50:16 better 25:20	big 10:17 birth 25:6 bit 20:5 boss 29:24 30:5 bottom 16:16 25:12 42:13 Bower 36:11 Bradley 35:20 Brandon 33:14 Brandy 33:18 33:20 break 7:8,9,12 48:18,19 49:5 bring 18:14 Burris 33:23 <hr/> C C 3:1 called 22:9,10 22:12 calling 20:17,20 care 10:17 career 23:10 case 1:6 2:5 5:13 6:22 7:1 16:20 53:9 54:2 Caucasian 14:3 cause 2:13 cc'd 27:2 CCR 52:2,13 Center 8:3 13:15 certain 2:13 CERTIFICATE 52:1 Certified 2:12 5:4 certify 52:3 55:4 chances 46:24 Chandler 5:18 change 13:12 54:7,11,15,19 54:23 changes 53:13 55:6,9
---	---	--	---

conference 5:16 8:2	27:17 31:6 34:4,10 35:13	46:17 55:13 days 53:18 Deakins 3:7 53:3 Dear 53:7 Deborah 4:13 33:4 43:20 December 8:14 8:15 11:5 19:1 19:21 20:6 22:5 27:15 28:5,23 29:3 29:6 31:9,13 37:11 49:16 decent 48:17 decision 40:23 declare 55:11 Defendant 3:6 Defendants 1:8 2:7,17 5:3 degree 14:12 demographics 13:20 dental 35:7 48:8,10,13 Department 1:6 2:5,16 3:9 5:12 6:10 14:15 14:19 18:20 deposition 1:11 2:8 5:3,10,15 5:20,25 6:7,11 6:22 15:12 16:21 17:1 18:22 25:9,14 36:21 51:14,16 52:3 53:8 55:5,7,10 depositions 16:20 18:22 25:8 described 7:1 52:6	deserved 23:11 desired 53:14 desk 26:2 desk' 26:3 Details 38:5,20 38:23 39:3 43:6 difference 42:2 different 11:1 12:8 34:17 direct 40:12 directed 47:10 directly 11:10 director 8:12,13 8:15,19 9:10,16 9:25 10:2 11:19 11:23 disagreed 43:11 disbelief 21:7 discipline 40:4 40:21 41:2,5,8 42:6,19 44:5 45:3,6 disciplined 40:6,8 45:8 discovered 46:7 discuss 21:24 47:11,16 discussed 27:22,25 28:18 30:24 39:4 43:7 discussing 31:4 31:8 40:16 District 1:1,2 2:1 2:1,14,14 5:14 5:14 Division 1:3 2:2 5:15 DOC 15:19 20:4 20:23 21:12 36:9,13,16 document 16:15 16:19 18:14,15 25:7 36:20 49:9	documents 16:14 17:1,3,5,7 17:14 37:1 DON 9:24 10:6 10:9,14,23 11:1 12:9 Doss 33:14 Dr 16:13 25:17 27:2 46:1,11,12 46:19,22 47:12,17,20,21 47:24 48:1 duly 6:16 Dustin 35:15,22 duty 17:12
E				

Epperson 25:17 46:1,11,12,19 46:22 47:2,12 47:17,20,21,24 48:1 ER 19:13,15 20:24 21:20 errata 53:10,14 53:17 54:1 Eucadway 16:13 everybody 23:23 29:7 exact 32:5,11,18 EXAMINATION 4:2 6:18 examined 2:9 6:16 Executed 55:13 exhibit 4:6 16:21 18:23 19:4 25:9,13 27:9 36:21,24 39:20 41:17,19 41:22 43:15,17 44:18 49:10 Exhibits 4:15 expectations 38:24 39:4 43:7 Expires 55:23 expressing 47:6 expressly 5:6 extended 12:18 extending 48:13 extent 20:2	32:25 fact 29:19 30:19 far 7:1 February 28:12 28:13,15,17 29:11 46:13,15 46:18 47:12,19 50:7 feel 23:7,9,11 24:19 29:5 41:1,4,9 felt 23:9 filing 53:19 Filled 37:21 find 53:8 fine 48:20 finished 17:18 first 6:16 7:4 12:21,24 15:2 20:11 26:25 35:17 41:1 42:5,18 flying 27:23 follow-ups 33:4 follows 6:17 foregoing 55:5 55:12 forgotten 29:11 form 4:10,11,12 4:13,14 32:10 40:3 42:10 43:19 44:25 48:6 55:6 forms 44:11,16 45:6 forward 30:16 forwarded 26:19,21 27:3 27:6 found 23:12,15 four 19:9 friends 47:7,25 48:1,3 Frizzell 4:14 33:10 45:1,4 48:6,7 front 7:6 16:15	16:18,23 18:15 25:8,10 39:20 41:17 43:15,17 44:18 49:10 fullest 20:2 further 51:5	heading 18:16 health 1:7 2:6,16 5:13 8:10,11,20 8:21 9:4,10,13 9:19,22 13:5,6 53:6 54:2 healthcare 6:7 13:14 G General 3:10 getting 13:6 give 6:25 39:16 39:17 44:16 given 45:4,7 giving 40:4 go 32:11 48:20 49:15 going 7:12 11:1 16:14,21 33:2 41:4 47:11 48:16,21 51:14 good 6:2,20 46:25 47:7,24 48:1,3 Great 8:9 17:21 green 8:2 group 31:4 guess 10:16,22 guessing 20:17 20:19 guide 19:2,10 20:16 49:17	impression 21:3 21:5,7 incident 17:21 19:6 26:15,18 38:6,20,23 39:4 43:6 including 15:23 increase 10:3,5 10:9,13,18,19 10:20 indicate 53:13 individuals 18:19 23:19 39:14 49:14 information 24:16 25:2,5 49:21,24 50:11 initially 10:7,10 26:23 28:23 inmates 13:15 institution 12:8 13:21 16:9 interview 37:23 interviewed 37:25 38:1 introduce 5:24 involving 17:22 issued 38:3 it'll 8:14 Ivan 3:3 6:2,20 48:16
			H H4:5 half 23:4,8 Hamilton 33:25 34:2 hand 52:8 handwritten 16:16 happened 23:8 happening 46:5 Harkins 17:13 24:1,5 30:24 30:25 31:3 49:25 50:6,15 50:20	J Jag 3:10 6:9,9 51:7 January 18:20 28:13,15 Jeff 36:1 Jenni 18:1,3,4 Jenni's 18:1 Jenny 3:14 11:15 25:17 27:2 30:8,9,10,23 38:1,2,4,16 40:24 44:13 44:15 Jerry 4:8 25:17
			I identified 16:20 identify 36:24	

27:2	33:20,23,25	leaving 28:10	M	44:15
Jessica 4:14	34:2,7,9,12,13	left 12:1,4 16:10	Main 3:4,7 53:4	meet 15:2
33:10 45:1	34:18,22 35:8	18:6 28:12	majority 14:2,4	meeting 38:12
48:6	35:10,15,16,17	legal 5:18	management	38:19 50:14
Joann 2:11 3:21	35:21,24 36:1	let's 12:20 17:9	9:14	Megan 33:8
5:4,17 52:2,13	36:6,12 40:25	48:20	manager 9:16	mention 13:7
53:24	42:1,2 44:7	level 14:11	13:5	27:24
job 9:9 11:9 12:1	45:15,24 46:6	40:20 41:2,5	manager's	mentioned
12:3 13:2,4	47:8 48:14	41:8,10,13,14	41:23 43:21	13:13 20:25
Johnson 4:12	knowledge	42:19 44:4	44:21 48:7	46:1
34:7 42:10,20	40:17	45:3	manner 6:1,8,11	met 38:9 42:25
42:25 43:4	known 47:15	lid 26:11	March 18:21	Michael 3:6
Judy 17:11,13	Koenig 34:18	life 13:2	23:2 37:5	53:3
24:1 30:24,25	35:3,8	line 41:23 42:1	38:19 49:25	mid 46:13,15,18
49:25 50:6	Krigel 3:3,3	43:21 44:21	47:12,19	middle 22:15
50:20	<hr/>	48:7 54:5,9,13	42:15	
June 9:1,2,7	L	54:17,21	Mike 6:6	
27:8,15 30:15	l 3:6 53:3	list 18:18 19:2,10	Mindy 36:5	
<hr/>	lab 25:25	20:16 34:17	mine 24:24	
K	30:25	49:17 50:8,11	minimal 10:12	
K-O-E-N-I-G	labeled 25:9	Litigation 3:21	minute 22:13	
34:20	LaBlance 1:4	5:19 53:1	Missouri 1:2,6	
Kansas 3:4,8,11	2:2,15 5:11 6:3	little 10:17 13:1	2:1,5,13,15 3:8	
53:4	6:21 15:2,5,15	20:5 48:18	3:11 5:12,14	
Kelley 12:12	15:23 16:1,3,5	locations 6:5	52:3,5 53:4,5	
kids 13:2	17:22 19:6,11	log 4:9 18:16	54:2	
Kirby 25:18 46:1	19:22 20:7,12	49:13	misunderstood	
46:19	22:1 25:16,23	long 6:23 8:13	29:17	
knew 29:25	28:10,12 30:15	23:17 29:8,9	MO 3:4,22	
30:3 46:8,10	30:24,25 31:5	longer 12:6 16:5	53:19	
47:13	47:13,21 53:5	look 17:3	MOCIS 22:1	
know 7:8 10:18	54:2	looked 17:15	32:25 46:4,6	
12:18 13:8,20	LaBlance's	20:13 21:25	moment 20:25	
15:18 16:10	18:19 19:2 21:4	36:16,18 44:7	months 10:20	
17:18 19:13,21	21:12,15 22:25	48:5 49:10	19:9 27:11	
19:24,25 20:1	27:10,16 31:9	looking 19:4,10	morning 6:2,20	
20:2,3,3,7,8	34:3,10 36:18	27:9 38:5	45:25	
23:10,12,19,22	37:12 39:14	Lori 33:16	<hr/>	
24:1,5,19 26:11	40:18 43:12	lot 13:1,9	N	
26:12 27:5	44:1,8 45:9	Louis 3:22	N 3:1 4:1 53:18	
28:19 29:4,10	46:3,20,23	53:19	name 5:17,18	
30:3,3,13 31:3	49:14	Lovelace 4:8	6:20 12:11	
31:8,16,18,19	lastly 7:19	25:17 27:2	16:12,13 18:2	
31:21,22,23	learned 20:12	LPN 9:8,11	18:24 20:21	
31:24 32:3,5,6	21:11	LPNs 11:10	22:3,4 34:20	
32:18 33:3,4,8	leave 12:4,5,6	Lybarger 35:15	35:2 36:1 54:1	
33:10,14,16,18	12:14	35:22		

ALARIS LITIGATION SERVICES

<p>54:2 55:10 names 14:21 31:8 33:3 34:17 35:17,17 36:13 necessary 55:8 need 7:8 13:7 needed 22:7,9 never 23:9 Nicholas 34:18 34:22 non-patients 45:23 non-providers 11:16 48:10 North 3:22 NOS 4:6 notarized 53:17 notary 53:15 55:22 notice 12:4,5,6 12:14,21,24 notified 38:7 November 1:13 2:9 5:9 52:4 53:2,8 54:3 Nugent 3:3 4:3 6:2,2,19,20 32:12 48:19 49:3 51:4 number 20:4 20:22,23 22:3,4 32:3,5 33:3 nurse 9:6 15:7 29:18,19 30:1 32:24 37:12 nurses 13:8 27:24 28:19 28:20 31:12,13 31:15,17,22,25 32:2,17,19 34:3,9 nursing 8:12,13 8:15,19 9:10,16 9:25 10:2 11:19 11:23</p>	<hr/> <p>O</p> <hr/> <p>oath 49:6 Object 32:10 objection 32:15 obligated 8:6 obviously 24:19 offer 39:8 office 26:2 38:13 46:2,24 47:10 53:18 Ogletree 3:7 53:3 Oh 50:5 okay 7:13,14 9:24 10:11,17 10:21,25 11:4,9 11:23 12:16 13:23 14:11 15:5,21 17:21 19:1,9 20:11,24 21:8,22 22:7 23:7 24:1,9,25 26:13 27:8 28:9,18 29:2 30:10,22 31:12 31:17,19,24 32:23 33:16 34:7,15 35:10 35:22 37:10 37:21 38:5,18 40:2,16 41:8 41:17,25 42:9 44:4 45:11,21 46:18 47:2 48:1 49:5,13 50:6,14 51:12 opinion 24:9,22 order 50:8,10 original 53:9 outside 15:15 36:14 39:3</p> <hr/> <p>P</p> <hr/> <p>P 3:1,1 P.C 3:3 p.m 2:10 22:15 48:22 49:2</p>	<p>51:15,16 page 4:2,6 16:22 18:23 19:2,10 20:14 20:15,16 23:23 24:14 24:18 25:3,4 49:17 50:8,11 53:10,15,18 54:5,9,13,17 54:21 paragraph 38:22 Parque 36:1 part 13:25 28:19 31:3 40:20 parties 5:24 Pat 30:9,10 patient 13:13 24:24 patients 13:23 13:24 14:2 pay 9:20 10:3,9 10:13,24 11:1 penalty 55:11 pending 2:13 people 27:24 29:22 45:19 percent 14:5,6 14:8 perjury 55:11 person 11:17 20:24 35:18 35:24 36:6 Philip 36:11 Phonetic 16:13 36:1 physician 47:5 47:9 pick 7:7 picture 20:22 place 6:1 47:18 52:6 Plaintiff 1:12 2:3 2:15,17 5:2 6:3 Plaintiffs 1:5 3:2 please 5:23</p>	<p>6:13 36:24 53:8,12,17 point 37:13 population 13:6 13:13 position 9:13,14 9:16,17 10:6,9 10:23 11:1,2,20 37:18,19,23 positive 35:18 47:1 possibly 34:5 practitioner 15:7 preparation 17:1 prepare 18:9 present 3:14 5:23 17:24 parties 5:24 Pat 30:9,10 patient 13:13 24:24 patients 13:23 13:24 14:2 pay 9:20 10:3,9 10:13,24 11:1 penalty 55:11 pending 2:13 people 27:24 29:22 45:19 percent 14:5,6 14:8 perjury 55:11 person 11:17 20:24 35:18 35:24 36:6 Philip 36:11 Phonetic 16:13 36:1 physician 47:5 47:9 pick 7:7 picture 20:22 place 6:1 47:18 52:6 Plaintiff 1:12 2:3 2:15,17 5:2 6:3 Plaintiffs 1:5 3:2 please 5:23</p>	<p>16:8 providers 11:11 provides 13:14 public 53:15 55:22 purposes 16:18 put 12:4,4,6,13 12:20,24 16:18 25:7 putting 12:21</p> <hr/> <p>Q</p> <p>question 7:12,17 14:1 20:5,6 29:17 32:16 questions 6:19 6:24 7:15 32:11 37:4 43:8 49:8 50:22,25 51:7 51:9 quick 49:15</p> <hr/> <p>R</p> <p>R 3:1 Rachel 3:10 6:9 34:13 racial 13:20 raise 9:20 rate 10:24 read 17:17,19 18:11 36:13 38:21,22 43:6 51:10 53:12 54:6,10,14,18 54:22 55:5 really 10:17 12:19 19:17 25:19 49:15 Ream 1:11 2:8 4:11 5:11 6:15 6:20 15:12 16:14 25:7 26:13 33:2 36:16 49:3 50:22 51:14 52:4 53:8</p>
---	--	---	--	---

54:1 55:4,19	relatives 14:18	Rex 33:8	42:5	46:3
Reason 54:7,11 54:15,19,23	relevant 30:19 rely 7:20	Rhodes 36:5	saw 48:6	she'd 30:3
rebuttal 39:8	remember 12:19	Richards 35:20	saying 25:1	sheet 27:10
recall 15:5,21 18:8 26:5,17	12:21 16:11 17:21 18:6	Richardson 2:11 3:21 5:4,17	says 25:25	38:7 41:16
27:16 39:7,18	23:25 25:22	52:2,13 53:24	30:23 39:23	42:24 44:3
43:4,14 45:7	28:1 29:1,10	right 7:3,23 8:1	42:23 50:6	49:18,24 54:1
46:4	37:25 49:15	12:22,23 13:18	scheduled	sheets 53:10,14
receive 9:20	50:16	15:21 16:23,25	22:13	53:17
received 24:8 37:5 40:21	Rempel 34:13	17:17 18:8 19:2	Schupp 38:1,2	Sherry 14:22
41:9	render 55:8	20:9 21:18	screen 36:20	shift 22:13,16,18
receiving 25:22	Renee 2:11 3:21	22:1,2,25	scroll 26:22	22:21,22
recommending	5:4 52:2,13 53:24	23:2,5 24:12	scrolled 25:12	shifts 22:10
40:20	report 11:13	24:20,21 25:3	26:13	short 49:5
record 5:8 16:18 19:16,22 20:7	15:10 30:4	25:3,12 26:5	seal 52:9	shorthand 5:4
20:12 23:13	45:19 48:10	27:1 30:5 31:1	search 18:16	shortly 15:3
31:6 32:16	reported 49:25	33:2 36:23	22:3	show 16:14
37:12 41:15	50:2,3	37:4,6,11,13,16	second 25:20	showed 27:10
46:8 47:14	reporter 2:12	38:10,24	Secondly 7:7	shows 49:16
48:20,22,23	3:20 5:5,21	42:16 43:19	section 38:6	sign 51:10 53:14
48:25 49:2	6:4,13 7:4 8:5	44:13,14 45:1	see 16:15,23	signature 5:6
51:15	52:1	45:20 47:14	17:9 18:15,24	37:8 39:23,25
records 18:19	reporter's 5:17	48:8,9 49:22	20:15 25:9,18	41:23,25 42:1
21:4,12,15	represent 5:24	50:1	25:25 26:4,14	42:12 43:20
22:25 27:17	6:21 18:18	right-hand 16:16	30:22 36:21	43:21 44:20
27:19 31:9	reprimand 38:3	Ritter 4:13 33:4	39:20,22	44:21 48:6,7
34:4,11 36:17	39:13 40:11	43:20,25	41:17,19 43:15	53:10,14,18
36:18 39:15	50:14	44:5	50:8	54:25
40:18 43:12	reprimanded	RN 9:6,11	see-through	signed 42:11
44:2,8 45:9	40:13,17 50:19	RNs 11:10	26:9	Sincerely 53:21
45:22 46:3	reprimands	role 11:4	seen 13:24 14:2	sit 26:3 39:13
46:20,23 47:3	40:14	room 5:22 7:21	send 51:11	40:4,10 50:14
49:14	requisition 26:1	7:23 8:2 21:17	sends 30:15	site 11:11
refer 25:4	reserved 5:6	43:1	sense 11:12	six 17:8
referenced	response 19:5	rumor 27:23	sent 27:8	small 25:19
48:12	responsible 11:6	29:14	separate 6:4	26:7
referring 20:25	rest 14:10	rumors 28:2,3,7	services 3:21	socialize 36:14
refused 25:25	result 39:14	28:9,13,18,22	5:19 8:20,21	software 22:1
regards 28:2	Results 18:16	30:11,17 31:5	9:5,10,13,19	32:25
29:20 31:4,12	retained 4:15	48:12,13	9:22 13:5,7,14	Somebody
40:4	return 53:17	<hr/> S <hr/>	53:1	32:13
regional 47:10	reviewed 16:25	safe 11:16 24:9	session 42:6	sorry 10:14 11:3
related 16:20	25:14 37:1	27:5	set 52:8	13:25 16:2
26:15,18	reviewing 39:3	salary 13:10	seven 27:11	19:25 26:22
	revisit 50:23	sat 26:2 40:14	Shannon 33:23	32:13
			share 46:24	sounded 12:13
			49:9	specific 22:10
			shared 38:13	specifically 29:1

specimen 26:1 26:5	30:7 40:12 42:3	tech 25:25 30:25	thought 12:10 three 15:23	17:10 47:22
spelled 34:20	supervisors 30:14	technical 10:25	time 5:9 12:21	type 20:22
spouse 14:15	sure 7:5,10 11:21	tel 3:5,8,12	12:25 19:12	typewriting 5:5
spread 31:5	12:17 14:1,10	tell 7:16 8:5,6	20:11,13 22:11	U
St 3:22 53:19	19:14 22:14,20	14:21 19:11	28:4,25 29:13	Uh-huh 18:25
staff 9:6 29:18 29:19,25 32:3	24:7 27:4,21	21:11,22 24:7	29:18,20,24	27:12
37:12 48:13	30:8 31:16	24:12 27:19	30:8,12,14	underneath 39:17
staffing 13:9	32:21 34:5	30:16 38:6,18	32:4 37:17	understand 6:25 7:15,16
start 8:25 12:20 16:21 28:2	37:10 40:24	40:10 45:12	38:14 40:12	8:6 10:16 32:5
started 15:4 35:8	45:13 46:25	47:2	46:17,17 48:17	49:6
starting 8:4	48:14 50:17	ten 31:13 32:7	48:18,22 49:2	understanding 24:12,25
State 2:12 52:2 52:5 55:1	surprise 50:20	32:20	51:7,10,15	49:22
statement 17:18 18:9,11 19:5	surprised 19:16	Teresa 4:7 18:10	52:6	understood 50:25
States 1:1 2:1,14 5:13	21:9	21:2 30:5,7	Timeline 37:10	United 1:1 2:1,13
stating 26:2	surprising 23:15	33:25 34:2	times 7:5	5:13
staying 12:5	23:17	Terri 1:4 2:2,14	Tipton 12:12	universe 17:14
Sterling 1:11 2:8 4:11 5:11 6:15	swear 6:13	5:11 6:3,21	title 8:18 9:4	urine 26:6
51:11,14 52:4	Switzer 33:16	15:2 17:11,12	15:6 35:6	utilize 32:25
53:8 54:1	sworn 2:9 6:16	25:16 26:24	titles 9:9 11:9	
55:4,19	8:4	27:8 30:15	today 6:25 8:7	
stick 46:15	system 46:4,7	47:7,24 53:5	16:25 17:15	
stipulate 6:10		54:2	18:11 25:14	
STIPULATED 5:1	T	Terri's 19:15	37:2 51:2	
stipulation 5:25	T 4:5	46:17	today's 5:9,19	
Street 3:4,7,11 3:22 53:4,19	Tabitha 4:12	testified 6:16	51:13	
stress 13:1,1	34:7 42:5,9,19	testimony 7:1	told 21:15,19,23	
stressful 13:4	42:25 43:1	24:25 49:20	21:25 26:2	
subordinate 50:4	take 6:21 7:8	Thank 6:12	27:16 29:25	
subscribe 55:10	48:19	18:14 32:22	30:1,10 35:22	
substance 55:7	taken 1:12 2:17	38:3 51:4,6,12	44:11,16 47:6	
Suite 3:4,7,11 53:4	5:3 6:11 15:12	thereon 55:9	50:18,19 51:2	
supervise 11:9	53:8 54:3	thing 24:20,21	top 18:24	
supervising 11:6	talk 27:24	40:7	total 17:8	
supervisor 11:11 26:20 30:2,2	talked 12:7 46:3	things 7:3	training 38:25	
	talking 29:5,14	think 8:24 10:8	39:1	
	29:22,24	11:22 15:21	transcribed 5:5	
	32:13 34:3,10	17:10,10 24:7	transcript 53:13	
	45:25 46:22	24:17 26:23	tried 25:7	
	Tammie 4:10	27:14,22	trouble 7:4	
	11:25 38:13,14	28:16 30:12	true 19:20 55:8	
	38:16 40:2	31:14 34:21,23	55:12	
	41:25 42:3,7,9	35:18,25	trust 7:16	
	42:12 43:2,23	38:14,14 42:15	truth 8:5,6 51:2	
	44:17,23	45:12 47:18	trying 10:23	
	46:24 48:2,4	48:4,18 50:24	twice 12:14,18	
		51:1	two 15:22,25	

ALARIS LITIGATION SERVICES

28:25 34:17	22:24 23:2,7	17 27:15 29:3	4:19-cv-0069...	3:12
47:16 49:15	23:10,20,22	18 4:9	1:6 2:5	8th 18:21
wasn't 11:10	24:6,10,13,15	2	4:46 22:15	9
24:21,23	41:1 42:6,18		40 31:20	9 16:22 19:1
26:23 47:6,11	43:5,12,25	20 9:2 12:22	400 3:7 53:4	9th 19:21 20:6
way 36:17	45:22	28:21 31:15	401 3:11	49:16
We'll 51:10	wrong 13:14	32:9,17,21	41 4:12	
We're 48:21	45:16	53:2 55:14	43 4:9,13 18:23	
49:5 51:14	wrote 18:12	2010 9:1,3,7	27:9 49:10	
we've 48:16	X	2017 15:3 18:12	44 4:14	
49:10	X 4:1,5	18:21 19:1,7	45 4:10 39:20	
WebEx 5:15	Y	20:6 22:5	4520 3:4,7 53:4	
weren't 30:13	Yeah 27:1	28:5 29:6	46 4:11 36:21,24	
32:2	28:24 50:5	31:10,12,13	41:17	
Western 1:2,3	year 8:14 23:4,8	37:11	47 4:12 41:20	
2:1,2,14 5:14	Yolanda 1:4 2:2	2018 8:24 11:5	41:22	
5:14	2:15 5:11 53:5	27:9,15 28:7	48 4:13 43:15,17	
whatnot 28:19	54:2	30:15 37:15	49 4:14 44:18	
WHEREOF 52:8	Z	2019 8:16 11:6	5	
white 13:24 14:3	Zoom 3:14	12:22,24 18:21	50 14:5,6,8	
14:6	0	23:2 28:12,13	31:22	
witness 5:6,21	1	29:11 37:6	6	
6:4,13 39:23	Wolf 35:10	49:25	6 4:3 27:15	
42:1 51:6,10,12	118:20	2020 1:13 2:9	6:45 22:23	
52:8 53:12	woman's 13:18	5:9 52:4 53:2	615 3:11	
54:1,25	work 8:9 14:15	53:8 54:3	63101 3:22	
Wolf 35:10	1-800-280-33...	20th 50:7	53:19	
woman's 13:18	3:23	23 25:13 26:25	64106 3:11	
work 8:9 14:15	1:02 48:22	24 25:13 26:25	64111 3:4,8 53:4	
14:18 18:4	1:10 49:2	25 4:8 37:5	644-2191 3:23	
21:21 24:3	1:14 2:10 51:15	25th 38:19	6th 27:8	
35:12	51:16	3		
worked 12:7	100 31:24 32:1,2	3 18:23 22:20	7	
16:7 22:7,9	100180 55:24	22:23,23	7 22:23	
24:23	1003 41:22	3-to-11 22:21	7:33 50:7	
working 8:25	1004 44:20	30 31:17 53:18	700 3:4	
19:12 21:20	1005 39:22	314 3:23	711 3:22 53:18	
22:20	1006 36:23	36 4:11	79 13:11,12	
workplace	11 22:20	39 4:10		
36:14				
wouldn't 22:4	11:36 2:10 5:10	4	8	
48:3	11th 53:19	4 1:13 2:9 5:9	816)471-1301	
write 26:17	12 4:7 16:16,21	18:23 52:4	3:8	
write-up 39:6,9	13th 3:11	53:8 54:3	816)756-5800	
39:11	15 4:8 25:9,10	4:19-cv-00693	3:5	
write-ups 39:17	25:13	5:13	816)889-5000	
written 11:22	16 4:7			

ALARIS LITIGATION SERVICES

www.alaris.us

Phone: 1.800.280.3376

Fax: 314.644.1334

Case 4:19-cv-00693-BP Document 67-1 Filed 12/03/20 Page 24 of 24